

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

LULAC, *et al.*,

*Plaintiffs,*

v.

GREG ABBOTT, in his official capacity as  
Governor of Texas, *et al.*,

*Defendants.*

Case No.: 3:21-CV-00259-DCG-JES-JVB  
[Lead Case]

ROY CHARLES BROOKS, *et al.*,

*Plaintiffs,*

v.

GREG ABBOTT, in his official capacity as  
Governor of Texas, *et al.*,

*Defendants.*

Case No.1-21-CV-00991-DCG-JES-JVB  
[Consolidated Case]

**BROOKS PLAINTIFFS' DESIGNATION OF POTENTIAL WITNESSES**

Pursuant to the Court's Scheduling Order, ECF No. 96, the Brooks Plaintiffs submit the following list of potential witnesses for the hearing on their preliminary injunction motion.

Witnesses
Senator Beverly Powell
Representative Chris Turner
Commissioner Roy Brooks
Justice of Peace Sergio de Leon
Senator Joan Huffman
Anna Mackin
Sean Opperman
Senator Kel Seliger

<b>Witnesses</b>
Rick Svatora
Garry Jones
Amy Befeld
Jeff Archer
Senator Kelly Hancock
Representative Phil King
Representative Todd Hunter
Kevin Sparks
Eva Bonilla
Clara Faulkner
Phyllis Goines
Felipe Gutierrez

<b>Expert Witnesses</b>
Dr. Matt Barreto
Dr. Jeronimo Cortina

Plaintiffs reserve the right to call any witness on Defendants' witness list, may call other witnesses not listed by either party in rebuttal, and reserve the right to supplement this list.

January 7, 2022

Respectfully submitted,

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*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I certify that all counsel of record were served a copy of the foregoing this 7th day of January, 2022, via the Court's CM/ECF system.

/s/ Mark P. Gaber  
Mark P. Gaber